

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ERIC L. JEFFRIES,)	CASE NO. C-1-01-680
	:	
Plaintiff,)	Judge Weber
	:	Magistrate Judge Hogan
vs.)	
	:	
PRUDENTIAL INSURANCE CO.,)	
	:	
Defendant.)	

NOTICE OF MANUAL FILING OF ADMINISTRATIVE RECORD

This serves notice that the plaintiff is contemporaneous with this notice filing manually the Administrative Record of the above matter - consisting of documents the defendant has Bates Labeled 00001-02836 and produced to plaintiff. According to the attached email notification, despite plaintiff's request that the defendant file this record that it maintains, the defendant refuses.

Respectfully submitted,

OF COUNSEL:

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/s Michael A. Roberts
Michael A. Roberts, Esq. (0047129)
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served upon Edward T. Wahl, Esq., FAEGRE & BENSON LLP, 2200 Wells Fargo Center, 90 South Seventh Street, Minneapolis, MN 55402-3901 and Jim Cummins, Waite Schneider Bayless, & Chesley, 1513 Fourth And Vine Tower, 1 West Fourth Street, Cincinnati, Ohio 45202 by hand delivery on this 21st day of October 2003.

/s Michael A. Roberts

From: "Wahl, Edward T." <EWahl@faegre.com>
To: "mroberts@graydon.com" <mroberts@graydon.com>
Date: 7/30/03 7:08PM
Subject: Jeffries v. Prudential

Mike:

We have not filed a complete copy of the Administrative Record with the Court and we do not intend to. Because Prudential put Mr. Jeffries in benefit and because the Court has issued the opinions it has, the record is unnecessary to the determination of any issues that remain. We also believe that the videotapes and supplemental pages are not germane to the pending motions.

We regret the omission of Pru 730-52; it must have been a photocopying error. AS you can see, they are documents you have seen before.

We have not yet responded to the subpoena. I will produce the entire record in the case, except privileged documents. Please confirm that you want this duplicate copy.

Ned

----- Original Message-----

From: Michael Roberts [mailto:mroberts@graydon.com]
Sent: Monday, July 28, 2003 7:43 AM
To: Wahl, Edward T.
Cc: Michael Roberts
Subject: Jeffries v. Prudential

Ned

Have you filed a complete copy of the Administrative Record with the Court? Since it is Prudential's Record it makes sense that you file the Record. Also, did you (or will you) provide the Court with: (i) copies of the Book submitted by Mr. Jeffries during his Administrative Appeals; (ii) all of the videotapes; and (iii) the additional Record pages you provided me both during this suit and during our New Jersey depos?

Also, I have never been supplied with the Bates range of documents: PRU 00730-752. Can you fax those to me today?

Finally, with respect to the other litigation, on May 7 I asked that you provide me with a copy of the documents you sent to Ellis in responding to his subpoena. Would you kindly do that for me as soon as possible?

Regards, Mike

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